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16 *Röhren -und Pumpenwerk Bauer Ges.m.b.H. and*
17 *Bauer North America, Inc.*

18 **UNITED STATES DISTRICT COURT**

19 **FOR THE STATE OF NEVADA**

20 SMART RAIN SYSTEMS, LLC, a Utah Limited
21 Liability Company,

22 Plaintiff,

23 vs.

24 ROHREN- UND PUMPENWERK BAUER
25 GES.M.B.H., a limited liability company of
26 Austria; BAUER NORTH AMERICA, INC., a
27 foreign corporation; DOES 1 through 10,

28 Defendants.

Case No. 2:22-cv-00232-CDS-EJY

JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO EXTEND
THE DEADLINE TO RESPOND TO
THE COMPLAINT

(FIRST REQUEST)

29 IT IS HEREBY STIPULATED AND AGREED, by Defendant Bauer North America, Inc.
30 (“Bauer NA”) and Plaintiff Smart Rain Systems, LLC (“Smart Rain”), through their respective
31 counsel, that the time for Bauaer NA to respond to the Complaint is extended up to and including
32 August 8, 2022.

33 Bauer NA’s current deadline to respond to the Complaint, by agreement of the parties, is
34 June 2, 2022. The deadline for Defendant Röhren -und Pumpenwerk Bauer Ges.m.b.H. (“Bauer

1 GmbH”) to respond to the Complaint is August 8, 2022, due to Bauer GmbH’s waiver of service.
2 The current stipulated and agreed extension of time for Bauer NA aligns Bauer NA’s responsive
3 pleading deadline with that of Bauer GmbH and allows the parties more time to explore the
4 possibility of an early settlement.

5 The reason for the extension is not for purposes of delay or to cause prejudice to any party,
6 but rather so that Bauer NA can fully evaluate the claims in the Complaint and that the parties
7 can potentially discuss settlement options. This is the parties first request for an extension from
8 the Court. This request complies with Local Rules IA 6-1, IA 6-2, and 7-1.

9 [Signatures to Follow]

Dated: June 2, 2022.

/s/ Chad R. Fears

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*Designated solely for service pursuant to
LR 1A 11-1(b)*

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated June 3, 2022